

EXHIBIT B

Subject: FW: In Re: FTX Cryptocurrency Exchange Collapse Litigation - Jurisdictional Discovery to Sino Global Capital Limited and Sino Global Capital Holdings, LLC

From: Mix, Michael <mmix@morrisoncohen.com>

Sent: Thursday, December 28, 2023 1:13 PM

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Subject: In Re: FTX Cryptocurrency Exchange Collapse Litigation - Jurisdictional Discovery to Sino Global Capital Limited and Sino Global Capital Holdings, LLC

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Counsel,

I write on behalf of Sino Global Capital Limited and Sino Global Capital Holdings, LLC regarding the jurisdictional discovery that your purported to serve on us on Friday evening. I believe I copied all Plaintiffs' counsel of record on the discovery requests but please forward this to any Plaintiffs' counsel that I inadvertently left off.

With regard to **Sino Global Capital Limited**, as you know, that entity has not yet been served with process. Indeed, your motion for alternate service on Sino Global Capital Limited is still pending. We only appeared specially on behalf of Sino Global Capital Limited for purposes of opposing the motion for alternate service, and for no other purposes. Because Sino Global Capital Limited has not been served, it has not yet moved to dismiss and your motion for jurisdictional discovery was not made against it. The Court's order granting in part and denying in part your motion for jurisdictional discovery (the "Order") did not even mention Sino Global Capital Limited. Accordingly, the jurisdictional discovery that you purported to serve on Sino Global Capital Limited was not authorized by the Order and is a nullity. Please immediately withdraw such jurisdictional discovery.

With regard to **Sino Global Capital Holdings, LLC** ("Holdings"), the jurisdictional that you propounded is not "limited," as required by the Order. To the contrary, the discovery sought concerns merits issues, and even seeks information related to other entities besides Holdings. It is apparent that you are using the jurisdictional discovery as a tool to improperly seek merits discovery against Holdings and other entities. That is not permitted by the Order. To avoid burdening the Court with unnecessary disputes, we would strongly encourage you to serve an alternate set of requests that are limited to jurisdictional issues in accordance with the Order. Moreover, a deposition is patently overbroad given the limited scope of the Order – Holdings objects to such deposition as outside the scope of the Order and will not sit for one.

We also disagree with the aggressive schedule that you attempted to foist on Holdings and other Defendants (we also note that Mr. Moskowitz's email setting forth such schedule was not initially sent to us), in which, among other things, you decreed that those Defendants should make all objections directly to the Magistrate Judge by January 5. That schedule is not in the Order, it was made up out of whole cloth. Holdings does not agree to such schedule, and will respond under the timeframe set forth in the Federal Rules of Civil Procedure; we also plan to produce a limited number of documents that pertain to jurisdictional issues. Moreover, it is not appropriate for Holdings (or any other Defendant) to make their objections directly to the Magistrate Judge; Holdings will make its objections directly to you pursuant to Rule 34.

We are willing to meet and confer about these issues.

Thank you,



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